

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC	)	CASE NO. 1:19-cv-145
	)	
Plaintiff,	)	
	)	JUDGE DAN AARON POLSTER
	)	
v.	)	MAGISTRATE JUDGE
	)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC,	)	
<i>et al.</i>	)	
	)	
Defendants.	)	

**DECLARATION OF MARINA AWED IN SUPPORT OF MOTION FOR EXPEDITED  
DISCOVERY OF STUDENT LOAN STIPEND DIVERSION SCHEME**

I, Marina Awed, pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am an intervening party in the above-captioned case.
2. I have retained the National Student Legal Defense Network to represent me in seeking discovery of the diversion of my student loan stipends.
3. I am enrolled in the Western State College of Law in Irvine, California, needing to complete one semester to earn my law degree. I am a full-time student at the law school.
4. Western State was owned by Argosy University and is now in receivership under this court's jurisdiction.
5. In order to pay for my legal education and my living expenses while I am attending school, I borrow money from the federal government.

6. My financial aid agreement with the federal government provides for loans in excess of what is required to pay my tuition balance and is intended to be disbursed to me as a stipend, to pay for living expenses while I attend school full-time. This year I borrowed additional money to pay for bar fees, a bar preparation class, and my living expenses while I study for the bar. I should have received a stipend in the amount of \$15,000 for the semester beginning January 2019. My stipend has not been disbursed.

7. The Receiver has explained in court that Argosy or its parent DCEH drew down money from the Department of Education, by certifying that my stipend and the stipends of other Argosy students had been paid, when they, in fact, had not been. The Receiver has not disclosed where or to whom that money went.

8. As a result of not receiving my stipend, I am no longer able to afford to pay the rent for my apartment. I am now living with my parents, an hour away from school. This commute time has been detrimental to the completion of my studies. My parents are also helping me with living expenses.

9. I am incurring substantial credit card debt to pay life expenses.

10. I do not know how I will afford my bar preparation class or bar registration fees.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26, 2019

/s/ Marina Awed  
MARINA AWED